

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Hon. Stacey L. Meisel, U.S.B.J.

U.S. BANKRUPTCY COURT
FILED
APR 30 2025
2025 APR 30 P 12:16
JEANNE A. WRIGHTON
BY: DEPUTY CLERK


In re:

RUPAL K. PATEL, Debtor

Case No. 24-18301-SLM

Chapter 11

MYSTICAL STARS, LLC, Debtor

Case No. 24-18290-SLM

(Jointly Administered)

**LIMITED OBJECTION TO DISCLOSURE STATEMENT AND REQUEST FOR
CLARIFICATION OF SECURED CLAIM TREATMENT**

Filed by: Alok Gaur, Judgment Creditor

TO THE HONORABLE COURT:

Alok Gaur, a judgment creditor in the above-captioned jointly administered Chapter 11 cases, respectfully submits this limited objection and reservation of rights in connection with the Disclosure Statement filed by the Official Committee of Unsecured Creditors and states as follows:

1. Judgment Lien and Secured Status

Movant holds a final judgment entered in the Superior Court of New Jersey against Rupal K. Patel, which has been duly docketed with the Clerk of the Superior Court. As a result, Movant holds a **judgment lien that attaches to real property owned by the Debtor in the State of New Jersey**, pursuant to N.J. Stat. § 2A:16-1 and applicable law.

Under **11 U.S.C. § 506(a)**, Movant is a **secured creditor** to the extent of available equity in such real property.

2. Status of Communications with Committee Counsel

Movant has submitted a copy of his docketed judgment to Committee counsel. However, as of the date of this filing, Committee counsel has **not clearly stated what, if anything further, is required in order to treat Movant's claim as secured** under the Committee's proposed Plan.

3. Conditional Support and Reservation of Rights

Movant does not object to the Committee's proposed Plan in principle and would be willing to support it **if the Plan clearly recognizes and treats his claim as secured**.

However, because the current Disclosure Statement does not provide such clarity, Movant respectfully:

- Requests that the Court direct the Committee to **treat Movant's claim as a secured claim** under § 506(a), or require that the Disclosure Statement be amended accordingly; and
- **Reserves all rights** to object to confirmation of the Plan, seek relief from stay, pursue enforcement of his lien, or take any other appropriate action to protect his rights.

4. Request for Property-Level Disclosure

Movant further requests that, in connection with any approval of the Disclosure Statement, the Committee be required to provide a **property-by-property breakdown** of:

- (i) real property values,
- (ii) existing liens (including docketed judgment liens), and
- (iii) projected equity, if any.

Such disclosure is essential to allow Movant to determine the extent to which his claim is secured and whether the Plan provides appropriate treatment under § 506(a).

5. Note on Timing of Filing

Movant respectfully realizes that his objection is being filed **one day after the formal deadline** of April 29, 2025, due to ongoing document review. Movant requests that the Court consider this filing in light of the upcoming May 13, 2025 hearing and the absence of prejudice to any party.

7. Conclusion

For the foregoing reasons, Movant respectfully requests that the Court:

1. Direct that Movant's claim be treated as secured under the Committee's Plan, or require clarification in the Disclosure Statement;
2. Require property-level lien and equity disclosures, as requested above;
3. Accept this limited objection as timely in light of the May 13 hearing; and
4. Grant such other and further relief as the Court deems just and proper.

Dated: April 30, 2025

Respectfully submitted,



Alok Gaur
9 Ulysses Street, Parsippany NJ 07054
alokgaur@gmail.com
323-823-5000(M)

**UNITED STATES BANKRUPTCY
COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

ALOK GAUR

9 Ulysses Street,

Parsippany NJ 07054

323-823-5000(M)

alokgaur@gmail.com

Pro Se Creditor

In Re:

MYSTICAL STARS, LLC F/K/A
INTERNATIONAL INC.,

Debtor

AND

RUPAL PATEL,
Debtor

2025 APR 30 P 12:16

Jeanne M. Hutchinson
J. M. Hutchinson
BY: SECURITY CLEAR

Case No.: 24-18290/SLM

Chapter 11 (Jointly Administered)

Case No.: 24-18301/SLM
Chapter 11

Judge: Stacey L. Meisel

Hearing Date: May 13, 2025

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2025 I served the following documents:

Limited Objection to the Committee's Disclosure Statement and Request for Clarification of Secured Claim Treatment

by emailing and/or in-person mailing via first class a copy to the parties listed in the chart below.

Dated: April 30, 2025


Alok Gaur

Name and Address	Relationship of Party to the Case	Mode of Service
Clerk of the Court: (in-person) U.S. Bankruptcy Court – District of New Jersey Martin Luther King, Jr. Federal Building 50 Walnut Street Newark, NJ 07102	Bankruptcy Court	In-person
Office of the U.S. Trustee: Michael Artis, Michael.A.Artis@usdoj.gov	US Trustee	Email
Anthony Sodono, III King & Spalding LLP and via email to asodono@ktslaw.com	Counsel to the Debtors	Email
Marc D. Miceli, Esq. Miceli Law, PC and via email to mmiceli@mm-lawpc.com	Counsel to Creditor, Minesh Patel	Email
Richard D. Trenk, Esq. Trenk Isabel Siddiqi & Shahdanian, P.C. and via email to rtrenk@trenkisabel.law	Counsel to the Official Committee of Unsecured Creditors	Email
Robert S. Roglieri, Esq. Trenk Isabel Siddiqi & Shahdanian, P.C. and via email to rroglieri@trenkisabel.law	Counsel to the Official Committee of Unsecured Creditors	Email